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Attorney for defendant
Carlos Lee Sanchez, Jr.

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICKY LEE WARE,
KIMBERLY ANN WALLACE and
CARLOS LEE SANCHEZ, JR.,

Defendants.

CASE NO. 2:24-CR-281-DAD

AMENDED STIPULATION REGARDING
EXCLUDABLE TIME PERIODS UNDER SPEEDY
TRIAL ACT; ORDER

DATE: February 24, 2025
TIME: 9:00 a.m.
COURT: Hon. Dale A. Drozd

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendants, by and through defendant's counsel of record, hereby stipulate as follows:

1. This case is set for a status conference on February 24, 2025. Counsel for Mr. Sanchez recently filed a stipulation (ECF 54) which inadvertently contained the incorrect (2/27/25) date for the presently set status conference.

2. By this stipulation, defendants now move to continue the status conference until April 28, 2025, and to exclude time between February 24, 2025, and April 28, 2025, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].

3. The parties agree and stipulate, and request that the Court find the following:

a) The government has produced discovery in this matter, to date, consisting of over 6,660 pages of investigative reports, photographs and video surveillance evidence. (The

1 discovery produced and noted herein does not include new discovery produced on February 18,
2 2025, nor does it include the contents of eight seized electronic devices.) The government has
3 further indicated additional discovery is forthcoming.

4 b) Counsel for defendants have met with their clients to discuss their respective
5 cases. Defense counsel desire additional time to conduct investigation into the charges, the
6 alleged roles of their respective clients, and to review discovery in this case. Defense counsel
7 will need additional time to discuss potential resolutions with their clients, prepare pretrial
8 motions, and otherwise prepare for trial.

9 c) Counsel for defendants believe that failure to grant the above-requested
10 continuance would deny them the reasonable time necessary for effective preparation, taking into
11 account the exercise of due diligence.

12 d) The government does not object to the continuance.

13 e) Based on the above-stated findings, the ends of justice served by continuing the
14 case as requested outweigh the interest of the public and the defendant in a trial within the
15 original date prescribed by the Speedy Trial Act.

16 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
17 et seq., within which trial must commence, the time period of February 24, 2025 to April 28,
18 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
19 T4] because it results from a continuance granted by the Court at defendant's request on the basis
20 of the Court's finding that the ends of justice served by taking such action outweigh the best
21 interest of the public and the defendant in a speedy trial.

22 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
23 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
24 must commence.

25 IT IS SO STIPULATED.
26
27
28

1 Dated: February 19, 2025

/s/ LINDA PARISI
LINDA PARISI
Counsel for Defendant
RICKY LEE WARE

5 Dated: February 19, 2025

/s/ CANDICE L. FIELDS
CANDICE L. FIELDS
Counsel for Defendant
KIMBERLY ANN WALLACE

8 Dated: February 19, 2025

/s/ JOHN R. MANNING
JOHN R. MANNING
Counsel for Defendant
CARLOS LEE SANCHEZ, Jr.

12 Dated: February 19, 2025

MICHELE BECKWITH
Acting United States Attorney

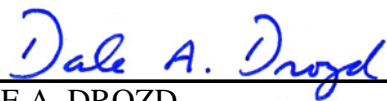
/s/ NICHOLAS M. FOGG
NICHOLAS M. FOGG
Assistant United States Attorney

18 **ORDER**

19 Pursuant to the stipulation of the parties and good cause appearing, the status conference
20 previously scheduled for February 24, 2025 is continued to April 28, 2025, at 9:30 a.m. and time is
21 excluded between February 24, 2025, and April 28, 2025, under 18 U.S.C. § 3161(h)(7)(A), B(iv), Local
22 Code T4.

23 IT IS SO ORDERED.

24 Dated: February 19, 2025


DALE A. DROZD
UNITED STATES DISTRICT JUDGE